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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,) MDL No. 3084 CRB
PASSENGER SEXUAL ASSAULT	DECLARATION OF MICHAEL
LITIGATION	KAGRAMANIAN IN SUPPORT OF
This Document Relates To:	OPPOSITION TO DEFENDANTS' MOTION TO DISMISS DUPLICATE CASES
Arpitkumar Patel	Ś
3:25-cv-05287	CASE NO 3:25-CV-05287

I, Michael Kagramanian, declare:

- 1. I am an attorney in the law firm of Ben Martin Law Group. I am admitted *pro hac vice* to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein:
- On February 28, 2025, Peiffer Wolf Carr Kane Conway & Wise filed a complaint on behalf of Plaintiff A.P. alleging sexual assault or harassment by an Uber driver in New Jersey on June 27, 2023. Complaint, A.P. v. Uber Technologies, Inc. et al., No. 3:25-cv-02105-CRB, ECF No. 1 (N.D. Cal. Feb. 28, 2025).

- 3. On June 27, 2025, Plaintiff A.P. filed a second complaint relating to the June 2023 incident this time through the Ben Martin Law Group and abandoning the pseudonym. *Patel v. Uber Technologies, Inc. et al.*, *No. 3:25-cv-05287-CRB, ECF No. 1* (N.D. Cal. June 27, 2025).
- 4. On August 31, 2025, counsel for Defendants notified Peiffer Wolf and Ben Martin Law Group that they believed that both firms filed claims on behalf of Plaintiff A.P.
- 5. After discussions and confirming dual representation of Plaintiff A.P., on October 16, 2025, Peiffer Wolf and Ben Martin Law Group resolved the dual representation issue, agreeing that Peiffer Wolf's case will remain, and Ben Martin Law Group will dismiss their case.

Executed this 29th day of October, 2025 in Dallas, Texas.

Respectfully Submitted,

Michael Kagramanian (TBN 24136938)

Ben C. Martin (TBN 13052400)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 29, 2025, a true and correct copy of the foregoing declaration of Michael Kagramanian In Support of Opposition To Defendant's Motion to Dismiss Duplicate **Cases** was filed electronically via the Court's CM/ECF system, which will send notification to all counsel of record.

Michael Kagramanian (TBN 24136938)

DECLARATION IN SUPPORT OF OPPOSITION TO DEFENDANTS MOTION TO DISMISS DUPLICATE CASES